

**UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS**

IN RE: PHARMACEUTICAL INDUSTRY )  
AVERAGE WHOLESALE PRICE ) MDL NO. 1456  
LITIGATION )  
\_\_\_\_\_  
 ) CIVIL ACTION: 01-CV-12257-PBS  
 )  
THIS DOCUMENT RELATES TO: ) Judge Patti B. Saris  
ALL CLASS ACTIONS )  
\_\_\_\_\_  
)

**JOINT MOTION TO ENLARGE THE TIME  
FOR DEFENDANT GLAXOSMITHKLINE, INC.  
TO RESPOND TO PLAINTIFFS' MOTIONS TO COMPEL**

The parties hereby move to enlarge the time for defendant GlaxoSmithKline, Inc. ("GSK") to respond to plaintiffs' pending motions to compel to March 15, 2005, as follows:

1. Plaintiffs' Motion to Compel Defendant GlaxoSmithKline, Inc. to Produce Documents in the Manner Required by Rule 34(b), filed February 3, 2005.
2. Plaintiffs' Motion to Compel Defendant GlaxoSmithKline, Inc. to Produce Rule 30(b)(6) Witnesses, filed February 3, 2005.

The parties hereby agree to enlarge the time for response to March 15, 2005. The reason for this request is that GSK has agreed to produce document source information and witnesses which may result in the resolution of the motions.

WHEREFORE, for the foregoing reasons, the parties respectfully request that this motion be granted.

Respectfully submitted,

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Dated: March 1, 2005

**CERTIFICATE OF SERVICE**

Docket No. MDL 1456

I, David S. Nalven, hereby certify that I am one of plaintiffs' attorneys and that, on March 1, 2005, I caused copies of the parties' Joint Motion to Enlarge the Time for defendant Glaxosmithkline, Inc. to Respond to Plaintiffs' Motions to Compel to March 15, 2005 to be served via VeriLaw on all counsel of record.

/s/ David S. Nalven

Dated: March 1, 2005